

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

**NEW HAMPSHIRE INDONESIAN
COMMUNITY SUPPORT, et al.,**

Plaintiffs,

v.

Case No. 1:25-cv-38-JL-TSM

DONALD J. TRUMP, et al.,

Defendants.

**“ASSENTED-TO” MOTION FOR A 30-DAY EXTENSION
OF DEFENDANTS’ RESPONSE DEADLINE TO JUNE 26, 2025**

Defendants hereby move, pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure and Local Rule 7.2(a), for a further 30-day extension of their May 27, 2025 deadline to respond to Plaintiffs’ Complaint, thus making their response due on or before June 26, 2025. In support thereof, Defendants state:

1. Plaintiffs’ Complaint was filed on January 20, 2025. ECF No. 1. Plaintiffs subsequently moved for a preliminary injunction on January 21, 2025. ECF No. 24.
2. Plaintiffs effectuated service of their Complaint on Defendants through service on the United States Attorney’s Office on January 24, 2025. *See Fed. R. Civ. P. 4(i)(1)(A)(i)-(ii).*
3. Thus, pursuant to Federal Rule of Civil Procedure 12(a)(2), Defendants’ response to the Complaint was originally due on March 25, 2025.
4. On February 10, 2025, this Court issued an Order granting Plaintiffs’ motion for a preliminary injunction, which enjoins the enforcement of Executive Order 14160, “Protecting the Meaning and Value of American Citizenship” (“Executive Order” or “EO”). ECF No. 77.
5. Defendants subsequently appealed the Court’s Order on April 10, 2025 to the

United States Court of Appeals for the First Circuit. ECF No. 94.

6. The government has also appealed a separate injunction against the EO issued in the *State of New Jersey et al. v. Trump et al.*, 1:25-cv-10139 (D. Mass.) litigation (hereinafter “*State of New Jersey*”) to the United States Court of Appeals for the First Circuit. *See State of New Jersey et al. v. Trump et al.*, 1:25-cv-1039, ECF No. 157 (D. Mass. Feb. 19, 2025). The First Circuit denied Defendants’ partial motion to stay the *State of New Jersey* preliminary injunction on March 11, 2025. *See State of New Jersey. et al. v. Trump et al.*, 25-1170 (1st Cir. Mar. 11, 2025).

7. On March 13, 2025, the government filed an application for a partial stay of the injunction issued in the *State of New Jersey* litigation in the Supreme Court of the United States. Briefing on that application has concluded, but the application remains pending. On April 17, 2025, the Supreme Court scheduled oral argument for the application on May 15, 2025 and deferred consideration of the application pending oral argument. Oral argument has since occurred.

8. On March 19, 2025, Defendants filed an assented-to motion for a 30-day extension of their then-pending March 25, 2025 response deadline in light of Defendants’ application for a partial stay of the injunction. The Court granted that motion on March 20, 2025. ECF Nos. 92-93.

9. On April 22, 2025, Defendants filed another assented-to motion for a 30-day extension of their then-pending April 24, 2025 response deadline in light of Defendants’ application for a partial stay of the injunction. The Court granted that motion on April 23, 2025. ECF No. 97.

10. Defendants’ current deadline to respond to the Complaint is May 27, 2025.

11. Given that Defendants’ application to the Supreme Court remains pending and that Defendants’ deadline to respond to the Complaint is forthcoming, Defendants, with Plaintiffs’ consent, seek an additional 30 days to respond to Plaintiffs’ Complaint. Defendants submit that it

would not be prudent to spend time and resources responding to the Complaint until the Supreme Court resolves the application and the First Circuit disposes of Defendants' appeal. Defendants therefore seek another short extension of the existing response deadline.

12. Pursuant to Local Rule 7.1(c), undersigned counsel for Defendants certify that they conferred with Plaintiffs' counsel in a good faith attempt to obtain concurrence in the relief requested in this motion, and Plaintiffs, through counsel, have stated that they consent to this relief.

13. This request is not made for purposes of delay, and no party will be prejudiced by the relief requested herein, particularly because Plaintiffs do not oppose the same. The requested extension will not result in the continuance of any hearing, conference, or trial.

14. Because this is an "assented-to" motion for an extension of time, no memorandum of law is necessary.

15. Accordingly, Defendants request a 30-day extension of the response deadline until June 26, 2025.

Dated: May 20, 2025

YAAKOV M. ROTH
Acting Assistant Attorney General
Civil Division

ALEXANDER K. HAAS
Branch Director

BRAD P. ROSENBERG
Special Counsel

s/ Yuri S. Fuchs
R. CHARLIE MERRITT
YURI S. FUCHS (CA Bar No. 300379)
U.S. Department of Justice
Civil Division, Federal Programs Branch
1100 L Street, NW
Washington, DC 20005
Phone: 202-598-3869
Fax: 202-616-8460

Email: yuri.s.fuchs@usdoj.gov

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants.

Dated: May 20, 2025

/s/ Yuri S. Fuchs
Yuri S. Fuchs
Trial Attorney